

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

FILED

for the

July 22, 2024

Western District of Texas

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

BY: APV

DEPUTY

Case No. EP: 24-M-3096-MAT

Eleazer Kasshoggi Mujica-Rojas Aka La Fresa

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 8, 2023 in the county of Midland in the  
Western District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

8 U.S.C. 1325 (a) (1):

being an alien to the United States, knowingly enter and attempt to enter the United States at a time and place other than as designated by immigration officers.

8 USC 1546(a):

Fraud and misuse of visas, permits, and other documents

This criminal complaint is based on these facts:

The facts are more fully described in the attached affidavit, herein incorporated by reference as Attachment A.

Continued on the attached sheet.

- ☐ Sworn to before me and signed in my presence.  
☒ Sworn to telephonically and signed electronically.

Date: July 22, 2024 at 10:14 a.m.City and state: El Paso, Texas

Complainant's signature

Asa Koontz Border Patrol Agent  
Printed name and title

Judge's signature

Miguel A. Torres, United States Magistrate Judge  
Printed name and title

## Affidavit

The DEFENDANT, Eleazer Kasshoggi Mujica Rojas, an alien to the United States and a citizen of Venezuela, illegally entered the United States from the Republic of Mexico on June 30, 2022, by swimming across the Rio Grande River approximately near Eagle Pass, Texas, in the Western District of Texas. The place where the DEFENDANT entered is not designated as a port of entry by immigration officers.

Immigration record checks on the DEFENDANT revealed that this was his first arrest in the United States. On July 6, 2022, a mere 6 days after his arrest by immigration officers in Texas, MUJICA-Rojas was arrested in Orlando, FL. MUJICA-Rojas was arrested for Domestic Violence-Touch or Strike, and Battery-Commit Domestic Battery by Strangulation. However, charges were later dropped. On August 28, 2023 made an Asylum claim to the USCIS Lubbock, Texas ASC. In support of his application, MUJICA-Rojas was obligated to complete immigration form I-589. On Immigration Form I-589, filed on August 8, 2023, MUJICA-Rojas swore under penalty of perjury under the law of the United States of America, that his application and the evidence submitted with it was true and correct. However, MUJICA-Rojas answered no to the following question, in violation of Title 18, United States Code, Section 1546(a) and Section 1746 of Title 28. "2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States (including for an immigration law violation)? No." On February 27, 2024, MUJICA-Rojas was approved for an Employment Authorization Card.

On December 3, 2023, an Interpol Red Notice was lodged against Eleazer Kasshoggi MUJICA-Rojas, reference Interpol Control Number A-11221/ 12-2023. The statement of facts reads- "On 09/20/2023, security agencies of the Nation, carried out an operation called "Operation of Liberation Cacique Guaicaipuro" for the commission of crimes such as homicide, kidnapping, extortion, robbery, drug trafficking, arms trafficking, and human trafficking. This organization of which Eleazar Kasshoggi MUJICA ROJAS, nicknamed "LA FRESA" as one of the Lieutenants, and who evaded from the authorities' hours before the operation." "Additional information about the case: These individuals are dedicated to extorting merchants, sending them photos and videos showing themselves exhibiting firearms. different calibers; as well as, they use explosive devices with the intention of making their victims pay in high currencies amounts of money in exchange for not trying against their lives or loved ones and if they do not obtain positive results, they decide to take away the lives of their victims, also the aforementioned subjects wearing clothing alluding to Venezuelan state security forces, install mobile checkpoint, who in turn seize (Vehicle Theft) the victims' vehicles to carry out acts criminals in different states of the country and in the same way using police and military clothing and long weapons, are introduced to homes in upper class areas, taking valuables." The arrest warrant is issued for the crimes of- **TERRORISM, FINANCING OF TERRORISM, TRAFFICKING IN ARMS AND AMMUNITION, AGGRAVATED EXTORTION, MONEY LAUNDERING, ASSOCIATION TO CRIME.** MUJICA-Rojas is listed in numerous Foreign open-source news articles for his involvement as a ranking member of Tren de Aragua. An additional foreign open-source article

shows MUJICA-Rojas dressed in CICPC (Cuerpo de Investigaciones Científicas, Penales y Criminalísticas) police uniform, which correlates information provided in Interpol Red Notice.

Based on the aforementioned facts, the affiant believes the MUJICA-Rojas, an identified ranking member of Tren de Aragua, a threat to public safety with links to terrorism, gang affiliation, and violent criminal activity.

Tren de Aragua is a transnational criminal organization known for conducting illicit activities and committing violent acts that sows terror in Venezuela and throughout Latin America. The organization engages in a variety of criminal activities, such as homicide, abduction, extortion, drug trafficking, arms/weapons trafficking, human smuggling, and human trafficking. Additionally, Tren de Aragua profits from trafficking women and children for sexual exploitation, forced labor, and forced recruitment into armed militant groups. Since early 2022, record number of Tren de Aragua members have migrated to the United States and Canada. While in the United States, the group has encountered/ arrested conducting the same crimes, across over 15 states. Within the United States, the gang has been involved in documented homicides, attempted murder of police officers, armed robberies, illicit weapon manufacturing, sex trafficking, alien trafficking, and grand theft. The group is known to operate interstate and commit crimes along with other members of Tren de Aragua.

A handwritten signature in black ink, consisting of a stylized, cursive script that appears to be the initials 'AS' followed by a long, sweeping horizontal stroke.